

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 22-40028

Plaintiff,

vs.

REDACTED FACTUAL BASIS  
STATEMENT

JAYDEN KUSIEK WOLF,

Defendant.

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The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

My name is Jayden Kusiek Wolf.

Between on or about May 25, 2021, and July 7, 2021, I knowingly employed, used, persuaded, induced, enticed, and coerced a minor female to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. I knew that such visual depictions would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer.

Between the relevant times above, I used my cell phone to access my Snapchat account with the username "Zayz222" to communicate with [Name Redacted], a minor female under the age of eighteen. In my Snapchat communications, I arranged to meet [Name Redacted] in person. I met with her

in Sioux Falls and used my cell phone to take a photo of my hand on [Name Redacted]'s buttocks area and exposed pubic area.

My cell phone, an iPhone 12, had previously been shipped and transported in interstate commerce.

All of my actions were in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

For forfeiture purposes, I further stipulate and agree that the following property was used or intended to be used in the commission of the offense described above:

iPhone 12.

ALISON J. RAMSDELL  
United States Attorney

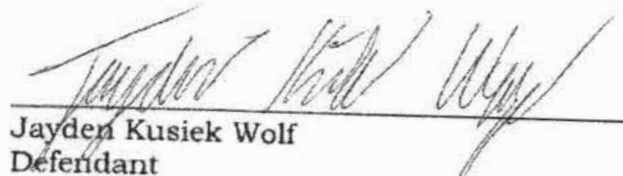


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Date

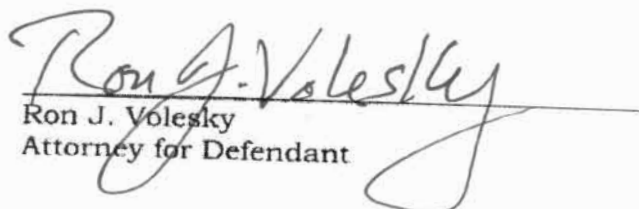
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11/20/2023  
Date



Jayden Kusiek Wolf  
Defendant

11/20/2023  
Date



Ron J. Volesky  
Attorney for Defendant